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Attorneys for Defendants, COUNTY OF
SAN BERNARDINO and DEPUTY
CHRISTOPHER ALFRED

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

STEFFON BARBER, an individual,

Plaintiff,

v.

COUNTY OF SAN BERNARDINO, a
municipal entity, and DOES 1 through
10, inclusive,

Defendant.

Case No. 5:22-cv-00625-KK-DTBx

*[District Judge, Kenly Kiya Kato,
Magistrate Judge, David T. Bristow]*

**DEFENDANTS' PROPOSED VOIR
DIRE**

Trial Date: 1/26/26

TO THE HONORABLE COURT AND TO ALL PARTIES AND COUNSEL:

By and through their counsel of record in this action, defendants COUNTY OF SAN BERNARDINO and DEPUTY CHRISTOPHER ALFRED (collectively herein after as “Defendants”) – hereby submit the following proposed case-specific Voir Dire questions to be posed to prospective jurors/the jury panel at the time of trial (to the extent permissible under the Federal Rules of Evidence), pursuant to Federal Rules of Civil Procedure 16 and 51; United States District Court, Central District of California Local Rules 16-2, 16-3, 16-4, 16-5, 16-6, 16-7, 16-8, 51-1, 51-2, 51-3 and 51-4; and the Orders of the Court (as applicable).

Defendants specifically reserve the right to amend these proposed Voir Dire

questions.

Defense Counsel request that follow-up questions to seek explanation for any “Yes” responses to the questions below be handled at sidebar, as appropriate.

DATED: December 18, 2025 Respectfully submitted,

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

By: /s/ Kayleigh Andersen
Eugene R. Ramirez
Kayleigh A. Andersen
Attorneys for Defendants, COUNTY OF
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CHRISTOPHER ALFRED

MK MANNING | KASS

VOIR DIRE TOPIC NO. 1 (Background):

a. Whether you, any member of your immediate family, or anyone close to you has ever been a member of, or made a charitable contribution to, or otherwise provided support to, the American Civil Liberties Union (“ACLU”), or any other civil rights group or organization.

b. Have you ever held a formal leadership role or position at work, in an organization, or in a labor union? If yes, please explain.

VOIR DIRE TOPIC NO. 2 (Potential Bias re: Police Practices):

a. There have been several stories recently across the country about alleged excessive force by police officers and other law enforcement officials. This case involves alleged excessive force by Sheriff's deputies. Does that cause you any concerns at all about your ability to be a completely unbiased and impartial juror for both sides?

i. What are those concerns, and how might they affect you?

b. Have you watched or followed any of the news concerning recent events that have put some police officers in an unfavorable or negative light, including allegations of using excessive force against an individual or the death of someone while in police custody? [*Request a sidebar.*]

i. If so, what have you heard or read?

ii. Would such reports affect your ability to be an entirely fair and impartial juror in this case, even a little bit?

iii. Has your opinion of the police or law enforcement changed as a result of the deaths of George Floyd, Breonna Taylor, Eric Garner, Laquan McDonald, Stephon Clark, Michael Brown, Freddie Gray, Tamir Rice, Philando Castile, or others?

c. Please raise your hand if you do not trust police officers to use the right amount of force when arresting a suspect.

d. Do you believe that law enforcement officers should never use deadly force against a suspect unless they are certain that the suspect is armed with a gun and dangerous?

e. Do you believe that officers should always be able to avoid using deadly force against a suspect, even if they believe the suspect may be armed?

f. Have you or anyone close to you ever owned or used a TASER, "stun gun," or similar electrical weapon?

i. Do you or they own it today?

- 1 g. Have you or anyone close to you ever owned a firearm?
- 2 i. If so, please tell us the type of firearm.
- 3 ii. Do you or they own it today?
- 4 h. Do you have any general beliefs against the use of firearms by the
- 5 police?
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VOIR DIRE TOPIC NO. 3 (Potential Bias re: Police or Government):

- a. Have you or anyone close to you ever had experience or training in law enforcement?
- i. If so, please describe the type of knowledge or training, and where it was acquired.
- ii. Is there anything about your knowledge or training (or that of someone close) that you believe would affect your ability to be an entirely fair and impartial juror in this case?
- b. Have you or anyone close to you had any personal contact with the SAN BERNARDINO COUNTY SHERIFF'S DEPARTMENT or any of its deputies? [*Request sidebar.*]
- i. If so, did you ever experience or observe any inappropriate conduct by the officers, detectives, or others with whom you had contact?
- ii. [*If yes:*] Do you think that experience might affect your ability to be a completely fair and impartial juror in this case?
- c. Do you have any negative opinions of the San Bernardino County Sheriff's Department specifically or the County of San Bernardino in general? If yes, please explain.
- d. Have you or anyone close to you ever been subjected to violence by a law enforcement officer or private security guard? [*Request sidebar.*]
- i. Please describe the circumstances.
- ii. For any such incident, do you believe the violence was excessive or unjustified?
- iii. Do you believe that this experience could affect your ability to be a completely fair and impartial juror in this case?
- e. Have you or anyone close to you ever been treated in an unfair manner or been injured unjustifiably or excessively by a law enforcement officer or

agency? [*Request sidebar.*]

i. Please describe the circumstances.

ii. Do you believe that this experience could affect your ability to be a completely fair and impartial juror in this case?

f. Have you or anyone close to you ever been accused of resisting arrest?

i. If so, please explain [*sidebar*].

g. Do you have any ill feeling toward, or any negative opinion of, police officers?

i. If so, please explain [*sidebar*].

h. Have you or anyone close ever considered filing, or actually did file, a formal complaint against a law enforcement agency or officer?

i. If so, please describe the circumstances [*sidebar*].

ii. Was the outcome of the lawsuit or complaint satisfactory for you?

i. Have you or anyone close to you ever been detained, arrested, or suspected or accused of a crime by any law enforcement agency? If so [*sidebar*]:

i. When and where did this occur?

ii. What law enforcement agency or agencies were involved?

iii. In your view, did the officers handle the matter properly or improperly?

iv. What was the outcome of the arrest/detention?

v. Is there anything about that experience that could affect your ability to be a completely fair and impartial juror in this case?

j. Have you or anyone close ever been investigated, charged with, or convicted of any criminal offense? If so, please describe the circumstances [*sidebar*].

i. Do you feel that law enforcement and the court system handled

1 the matter properly or improperly? If not, why not, and in what
2 ways?

3 k. Have you or anyone close to you ever visited someone in jail or prison?

4 [*Request sidebar.*]

5 i. Please describe the circumstances.

6 ii. Do you believe that this experience could affect your ability to
7 be a completely fair and impartial juror in this case?

8 l. Have you or anyone close ever been a victim of, or witness to, a crime,
9 whether it was reported to law enforcement or not? [*Request sidebar.*]

10 i. Do you feel law enforcement handled the matter properly or
11 improperly? If improperly, why, and in what ways?

12 m. Do you believe that when law enforcement officers testify as witnesses
13 in court they are any less truthful and accurate than civilian witnesses?

14 n. In a case like this one with Sheriff's deputies as defendants, would you
15 tend to distrust the testimony of other Sheriff's deputies testifying in favor of
16 the defense?

17 i. If yes, please explain [*sidebar*].

18 o. Have you ever protested against police misconduct of any kind?

19 p. Do you generally support people who protest against police
20 misconduct?

21 q. Do any of you believe that, in general, police officers tend to use too
22 much force or use too much violence?

23 r. Do any of you believe that more law enforcement officers should lose
24 their jobs in response to claims of misconduct?

25 s. Do any of you have any bias, even a small one, against the police or
26 other law enforcement officers that we have not yet discussed?

27 i. [*Sidebar.*] If yes, please explain.

28 t. Have you or someone close to you served in the military or reserves?

- i. If yes, please explain, who served, in what branch, the dates, how the person was discharged, and where the person served.
- ii. Was the person ever in combat?
- iii. If yes, please explain.

VOIR DIRE TOPIC NO. 4 (Bias to Case Facts):

- a. Does the fact that Mr. Barber was shot, without hearing more, cause you to believe that he probably deserves some compensation from the Defendants?
- b. Do you believe that any time the police shoot a suspect, it is probably an excessive or unreasonable use of force?
- c. After hearing all the evidence in this case, if you are not convinced that, by a preponderance of the evidence, the deputy Defendant used excessive force in causing Mr. Barber's injuries, would you believe that he still deserves some compensation from the Defendants for his injuries?

VOIR DIRE TOPIC NO. 5 (Potential Bias re: Injuries):

- a. Do you know anyone who has experienced serious physical, mental, or emotional pain and suffering due to the conduct of another person or party?
 - i. If yes, please explain.
 - ii. If yes, do you believe that such person was entitled to compensation from the other party or person? Please explain.
- b. Do you know anyone who has suffered a gunshot wound?
 - i. If yes, please explain.
- c. Do you or anyone close to you have any experience or training in substance abuse or treatment?
 - i. If yes, explain.
- d. As we've already discussed, the Plaintiff in this case claims that the Defendant deputy used unreasonable and excessive force against him: Do you believe the nature of that injury, or your prior experiences, will in any way make it harder for you to be fair and impartial to the parties that Plaintiff claims to be liable for his injuries (i.e., the Defendants)?
 - i. If yes, please explain.

VOIR DIRE TOPIC NO. 6 (Court Experience and Opinions):

- a. Have you ever sued someone or been sued by someone, including for a divorce?
 - i. If you were a party to a prior or current lawsuit, were you plaintiff or defendant?
 - ii. What kind of case was it and what were the circumstances and events that gave rise to the dispute?
 - iii. If you were a party to a divorce, were you the petitioner or respondent?
 - iv. Do you believe that anyone involved in the process treated you or anyone close to you unfairly? If yes, please explain.
- b. Have you or anyone close to you ever had any negative experience with the justice system, including both the civil and criminal justice systems?
- c. Do you believe that any negative feelings you have about the justice system could affect your ability, in any way, to be a completely fair and impartial juror in this case?
- d. Do you generally assume that a lawsuit is probably valid if it makes it to trial?
- e. Do you believe that people who have experienced significant or serious losses generally do not receive enough compensation if they prevail in a lawsuit they filed?

VOIR DIRE TOPIC NO. 7 (Familiarity With Case, Parties, Jurors):

- a. [After introductions of court staff and attorneys:] Do you, or someone close to you, know any of the court staff, lawyers, or law firms in this case?
- b. [After reading list of parties and potential witnesses in the case:] Do you, or someone close to you, have any experience or association with any of the parties or potential witnesses in this case?
- c. Do you or someone close to you have any experience or association with the COUNTY OF SAN BERNARDINO or the SAN BERNARDINO COUNTY SHERIFF'S DEPARTMENT? Please explain.
- d. Have you or anyone close ever had a negative experience with the COUNTY OF SAN BERNARDINO or anyone who works for the COUNTY or any of its agencies?
- i. If yes [sidebar], please describe what happened and who was involved.
- ii. Is it possible that those experiences could affect your ability to be an entirely fair and impartial juror in this case given that the COUNTY OF SAN BERNARDINO is a party in the case?
- e. Prior to arriving in the courtroom today, had you heard or read anything about this case or any other case involving these parties? [If so:] Because of what you have read or heard, do you have any opinions about this case?
- f. Prior to arriving to court for your jury duty, had you heard or read anything about the San Bernardino County Sheriff's Department? [If so:] Because of what you have heard or read, do you have any opinions about this case or the parties involved in this case?
- g. Did you know or recognize anyone else in the jury pool before coming here today?
- i. If so, how do you know each other, and will your relationship affect you if you both end up on the jury?

VOIR DIRE TOPIC NO. 8 (Compliance With Law & Reason):

- a. Will anyone have difficulty following the Court's instructions on the law and evidence, or applying the law as instructed in this case to the facts of the case, without any reservation: regardless of whether you approve or disapprove of the legal rules stated in those instructions?
- b. Will you promise to base your decision in this case only on credible, admitted evidence presented in this courtroom, and to wait until the very end of the trial, after you've heard from both sides, before making up your mind?
- c. If you find that Plaintiffs fail to prove his case against the Defendants by a preponderance of the evidence, would anyone here be unwilling, unable, or reluctant to send Plaintiffs out of this courtroom empty-handed?
- d. Is there anything else that makes you doubt that you would be completely fair, impartial, and unbiased in this case?
 - i. If there is, it is your duty to tell me at this time.
- e. Is there anything else that the Court or parties should know that might affect your ability to serve as a juror?
 - i. If there is, it is your duty to tell me at this time.